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PAGES 1-10

IN THE UNITED STATES DISTRICT COURT OF THE
WESTERN DISTRICT OF OKLAHOMA

FILED

JUN 20 2017

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY _____ DEPUTY

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Exh BT
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VANESSA G. LYONS CALVIN,
DAUGHTER. TRUSTEE & EXECUTOR
OF JIMMIE AND MERCY D. LYONS
IRREVOCABLE TRUST 1991
5921 N. 131st Drive
Litchfield Park Az. 85340
240-299-8285

Plaintiff's
vs

Case NO.CIV-17-0610-HE

DISTRICT OF COMANCHE COUNTY
OFFICE OF THE DISTRICT ATTORNEY
DISTRICT JUDGE
ATTORNEY AT LAW
VICKIE LEYJA, (Bar #17527)
JOHN W. DOOLIN, (Bar #2427)
SHIRLEY ANN LYONS
MARKET ONE REAL ESTATE FRIM
MR. & MRS. HANK CHANG
JEFF L & ROBIN J BREWER
BREWER LIVING TRUST 2008
NATIONWIDE ADVANTAGE
MORTGAGE COMPANY
SOUTHWEST ABSTRACT & TITLE CO.
BANCFIRST

PERSONAL INJURY,
CRIMINAL ACTION,
FEDERAL QUESTION
JURISDICTION

20 | Defendant's

AMENDMENT TO

MOTION AGAINST SHIRLEY ANN LYONS FOR
CRIMINAL BIGIMIST ACTIVITY AND AGAINST
ATTORNEY

THE ATTORNEY'S AT LAW, VICKIE C. LEYJA, OBA NO. 17527
AND JOHN W. DOOLIN, OBA NO. 2427, OKALHOMA COMANCHE
COUNTY DISTRICT JUDGE FOR CONCEALING AND PROTECTING
BIGIMIST ACTIVITY, AND A MOTION AGAINST ALL DEFENDANTS
FOR THEIR PARTICIAPTION IN CRIMINAL ACTS OF REAL ESTATE
SCHEMES AND REAL ESTATE FRAUD COMMITTED IN THE SALE
OF STOLEN REAL ESTATE PROPERTY FROM THE JOINT NAMES
OF JIMMIE LYONS AND MERCY D LYONS IRREVOCABLE TRUST

IN THE UNITED STATES DISTRICT COURT OF THE
WESTERN DISTRICT OF OKLAHOMA

FILED

JUN 1 2017

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY W.M., DEPUTY

VANESSA G. LYONS CALVIN,
DAUGHTER, TRUSTEE & EXECUTOR
OF JIMMIE AND MERCY D. LYONS
IRREVOCABLE TRUST DATED 1991
5921 N. 131st Drive
Litchfield Park Az. 85340
240-299-8285

Plaintiff's

CIV 17 - 610 R

VS

Case NO

SHIRLEY ANN LYONS
4275 Southern Oaks Dr.
Edmond Ok 73034
ATTORNEY AT LAW
JOHN W. DOOLIN, (Bar #2427)
VICKIE LEYJA, (Bar #17527)
802 SW D Avenue,
Lawton, Ok 73501

-) CIVIL ACTION,
-) PERSONAL INJURY,
-) CRIMINAL CHARGES,
-) DIVERSITY JURISDICTION
-) FEDERAL QUESTION
-) JURISDICTION

Defendant's

1
2

MOTION FOR CRIMINAL CHARGES AGAINST
SHIRLEY ANN LYONS FOR BIGIMIST ACTIVITY AND
THE ATTORNEY'S AT LAW, VICKIE C. LEYJA, OBA NO. 17527
AND JOHN W. DOOLIN, OBA NO. 2427 FOR CONCEALING AND
PROTECTING BIGIMIST ACTIVITY

Comes now, May 24, 2017 the Trustee & Executor and Daughter
Vanessa G. Lyons Calvin In behalf of the Plaintiffs class members
and the Beneficiaries the group the six adult children Of the Estate
of Jimmie Lyons, File a Motion For Criminal Charges Against
Shirley Ann Lyons for Bigamist Activity and Against The Attorneys

WESTERN DISTRICT OF OKLAHOMA
APR 21 COMO COUNTY
PM 4:52

IN THE MATTER OF THE ESTATE OF
JIMMIE LYONS, DECEASED AND
MERCY D LYONS, DECEASED
VANESSA G. CALVIN
DAUGHTER TO THE DECEASEDS
Plaintiff,
vs
SHIRLEY ANN LYONS, aka
SHIRLEY ANN COLLIER, aka
SHIRLEY ANN WIHITESIDE, aka
SHIRLEY ANN MURRAY, aka

CIV-15-415 HE
NO. _____

FILED

APR 17 2015

CARMELITA FEDERASHAW CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY DEPUTY

REQUEST A NOTICE OF REMOVAL

AND A WRIT OF MANDATE FREEZE OF ACCOUNTS

AND THE RECOVERY AND SEIZURE OF LAND AND PROPERTY

COMES now, April 16, 2015 Vanessa Calvin (Pro. Se). Lineal Descendant, and third (3) Oldest
And Daughter to the Estate of Jimmie Lyons and Mercy D Lyon Deceased, submits this

REQUEST A NOTICE OF REMOVAL AND A WRIT OF MANDATE FREEZE OF ACCOUNTS

AND THE RECOVERY AND SEIZURE OF LAND AND PROPERTY

as follows:

Under the 28 U.S.C § 1332. Diversity of Citizenship

In case PB 2014-4 was originally filed in a state court of Comanche County and the requirements
for federal jurisdiction due to the diversity and the amount of controversy presented in the
proceedings regarding a probability and alleging suspicion of Embezzlement, Extortion, Fraud
and extreme Negligence surrounding our father Jimmie Lyons death and estate as a Vietnam
Veteran Retiree from the United States Army after 30 years of service, and a Retiree of The
Department of Interior and Labor, with his Estate estimated at 1.6 million dollars or more. The
suspicion and a probability of Criminal Bigamist activity exists by the alleged second spouse of
Jimmie Lyons deceased our father, to Shirley Ann Lyons, there is extreme doubt regarding her
divorcees and her claims to several Federal Government Benefits used and titled as a spouse,
wife, or widow, and one confirmed marriage to Mr. Curtis Murray (US Military Army Retire)
given by her testimony under oath. This case consistently involves a high risk to Government

IN THE UNITED STATES DISTRICT COURT OF THE
WESTERN DISTRICT OF OKLAHOMA

FILED

OCT 21 2016

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY _____, DEPUTY

1) VANESSA G. LYONS CALVIN,)
DAUGHTER & A TRUSTEE OF THE STATE)
OF ARIZONA AND TRUSTEES OF)
JIMMIE LYONS & MERCY D. LYONS)
IRREVOCABLE TRUST DATED 1991)
Plaintiff's)
vs)
1) Nationwide Mortgage Company)
2) Market One Realty Mr. ~~Hank~~ Chang)
1101 NW 67th St, Lawton, OK 73505)
3) Southwest Abstract & Title Company)
902 D Avenue, Lawton Oklahoma 7350)
4) Bancfirst 501 C Avenue,)
Lawton Oklahoma, 73502)
5, 6 Jeff L and Robin J Brewer)
88 E Pheasant Ln. Lawton Ok, 73507-8511)
Defendant's)

Case NO. CIV-16-1225-R

Filed
Evidence
Book
Transcripts
Dec 21
OKI

COMPLAINT
OF FRAUD DAMAGES AND NEGLIGENCE SUFFERED AGAINST
LAND & REAL PROPERTY OF JIMMIE LYONS AND MERCY D LYONS
IRREVOCABLE TRUST DATED 1991 AND THE TRUST OF THE STATE OF ARIZONA

COMES now, Vanessa G. Lyons Calvin (Pro, Se), Daughter and of the State of Arizona Trustees of Jimmie Lyons and Mercy D Lyons Irrevocable Trust Dated 1991, submits a COMPLAINT ~~OF FRAUD DAMAGES SUFFERED AGAINST LAND & REAL PROPERTY OF JIMMIE LYONS AND MERCY D LYONS IRREVOCABLE TRUST DATED 1991 AND THE TRUST OF THE STATE OF ARIZONA~~ as follows:

A. In behalf of the Beneficiaries who are the six (6) adult children born of the marital union of Jimmie Lyons and Mercy D Lyons Irrevocable Trust submits this Compliant against the following individuals and companies for Fraud Damages, Negligence and Abuse Suffered when using the Joint names of their parents:

- 1) Nationwide Mortgage Company 1100 Locust St. Dept 2009, Des Moines Ia 50391-2009
- 2) Mr. and Mrs. Chang owners of Market One Realty, 1101 NW 67th St, Lawton, OK 73505
- 3) Southwest Abstract & Title Company, 902 D Avenue, Lawton Oklahoma 73501
- 4) Bancfirst 501 C Avenue, Lawton Oklahoma, 73502
- 5) Jeff L and Robin J Brewer, 88 E Pheasant Lane, Lawton Ok, 73507-8511

FILED

NOV 23 2016

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY W, DEPUTY

IN THE UNITED STATES DISTRICT COURT OF THE
WESTERN DISTRICT OF OKLAHOMA

Filed with
One year w/ the
Federal Court
P/C Letter Date 30. 2016

VANESSA G. LYONS CALVIN,
DAUGHTER, TRUSTEE & EXECUTOR OF
THE JIMMIE LYONS & MERCY D. LYONS
IRREVOCABLE TRUST DATED 1991 LLC

Plaintiff's

vs

1. STATE OF OKLAHOMA
X OFFICE OF THE ATTORNEY GENERAL
SCOTT PRUITT A.G.
313 N.E 21st Street Ok City Ok 73105
2. DISTRICT OF COMANCHE COUNTY
DISTRICT #5 FRED SMITH D.A.
315 SW 5th St. Suite 502 Lawton, Ok 73501
3. JUDGE GERALD F. NEUWIRTH
315 SW 5th St. Suite 507 Lawton, Ok 73501
4. JOHN W. DOOLIN, (Bar #2427)
5. VICKIE LEYJA, (Bar #17527)
ATTORNEY AT LAW
802 SW D Avenue, Lawton, Ok 73501
6. SHIRLEY ANN LYONS
4275 Southern Oaks Dr. Edmond Ok 73034
7. NATIONAL ADVANTAGE
MORTGAGE COMPANY
1100 Locust Street, Des Moines, 50391-2009
8. MARKET ONE REAL ESTATE FIRM.
MR. & MRS. HANK CHANG
1101 NW 67th St. Lawton, OK 73505
9. SOUTHWEST ABSTRACT & TITLE CO.
902 D Avenue, Lawton Oklahoma 7350
10. BANCFIRST 501 C Ave., Lawton Ok. 73502
11. JEFF L & ROBIN J BREWER
88 E Pheasant Ln. Lawton Ok, 73507-8511

Defendant's

Case NO. CIV-16-1225-R

CLASS ACTION, CIVIL RIGHTS,
DIVERSITY JURISDICTION

AMENDMENT COMPLIANT

IN THE UNITED STATES DISTRICT COURT OF
WESTERN DISTRICT OF OKLAHOMA

PRIOR PRIORITY

MAR 01 2017
CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OF OKLA.
BY MAILED DEPUTY

VANESSA G. LYONS CALVIN,
DAUGHTER, TRUSTEE & EXECUTOR OF
THE JIMMIE LYONS & MERCY D. LYONS
IRREVOCABLE TRUST DATED 1991 L.I.C.

Plaintiff's

Case NO. CIV-16-1225-HE

vs

1.STATE OF OKLAHOMA
OFFICE OF THE ATTORNEY GENERA
SCOTT PRUITT A.G.
313 N.E 21st Street Ok City Ok 73105
2.DISTRICT OF COMANCHE COUNTY
DISTRICT #5 FRED SMITH D.A.
315 SW 5th St. Suite 502 Lawton, Ok 73501
3.JUDGE GERALD F. NEUWIRTH
315 SW 5th St. Suite 507 Lawton, Ok 73501
4.JOHN W. DOOLIN. (Bar #2427)
5.VICKIE LEYJA. (Bar #17527)
ATTORNEY AT LAW
802 SW D Avenue, Lawton, Ok 73501
6.SHIRLEY ANN LYONS
4275 Southern Oaks Dr. Edmond Ok 73034
7.NATIONWID ADVANTAGE
MORTGAGE COMPANY
1100 Locust Street, Des Moines, 50391-2009
8..MARKET ONE REAL ESTATE FRIM.
MR. & MRS. HANK CHANG
1101 NW 67th St. Lawton, OK 73505
9.SOUTHWEST ABSTRACT & TITLE CO.
902 D Avenue, Lawton Oklahoma 7350
10.BANCFIRST 501 C Ave., Lawton Ok. 73502
11.JEFF L & ROBIN J BREWER
88 E Pheasant Ln. Lawton Ok. 73507-8511

Defendant's

CLASS ACTION, CIVIL RIGHTS,
DIVERSITY JURISDICTION.

MOTION TO RESPOND TO THE DEFENDANT'S MOTION TO DISMISS
AMENDMENT COMPLIANT AND BRIEF IN SUPPORT

than the requirements of the constitution. The Supreme Court has found that a "suit arises under the law that creates the cause of action.

" American Well Works v. Layne, 241 US 257 (1916), and therefore, only suits based on federal law, not state law suits likely to provoke a federal law defense, create federal question jurisdiction, Louisville & Nashville R. Co. v. Mottley, 211 U.S. 149 (1908)."

<http://U.S. legal-dictionary.thefreedictionary.com>

Conley v. Gibson, 355 U.S. 41 at 48 (1957) "Following the simple guide of rule 8(f) that all pleadings shall be so construed as to do substantial justice" ... "The federal rules reject the approach that pleading is a game of skill in which one misstep by counsel may be decisive to the outcome and accept the principle that the purpose of a pleading is to facilitate a proper decision on the merits." The court also cited Rule 8(f) FRCP, which holds that all pleadings shall be construed to do substantial justice.

<http://legal-dictionary.thefreedictionary.com>

Maty v. Grasselli Chemical Co., 303 U.S. 197 (1938)

"Pleadings are intended to serve as a means of arriving at fair and just settlements. They should not raise barriers which prevent the achievement of that end. Proper pleading is important, but its importance consists in its effectiveness as a means to accomplish the end of a just judgment." <http://legal-dictionary.thefreedictionary.com>

3). The Amendment Compliant included and filed against The State of Oklahoma, Comanche County Oklahoma, Judge Gerald Neuwirth, Attorney's at Law Vickie Leyja, John W. Doolin, Shirley Ann Lyons (for probable Bigamist activity, Book 1 Tab 2, Tab 7, and Wrongful Death of Jimmie Lyons see documents Exhibit 3), Market One Real Estate Firm Mr. and Mrs. Hank Chang, Real-Estate Investors Jeff and Robin Brewer (also known has the Brewer Living Trust 2008), Bancfirst, Nationwide Advantage Mortgage Co., Southwest Abstract & Title Company, and Damages that apply to all Defendant's individually listed in the Amendment Compliant, adversely effecting adult children's individual Civil Rights by prolonged issues.

4). The Amended Compliant has Complete Diversity Jurisdiction according to 28 U.S.C 1332 and it can be proven with legal certainty the Amount in question exceeds the \$75 thousand dollars required and with an Estimated Amount of Seventy Five Million (\$75) Million Dollars that can

(P#16) IN THE UNITED STATES DISTRICT COURT OF THE
WESTERN DISTRICT OF OKLAHOMA

FILED
MAR 29 2017

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY VAN DEPUTY

VANESSA G. LYONS CALVIN,)
Plaintiff's) Case NO. CIV-16-1225-HE
vs)
STATE OF OKLAHOMA)
et. al.,) CIVIL RIGHTS,
Defendants) DIVERSITY JURISDICTION,

SECOND (2) AMENDMENT COMPLIANT

Vanessa G. Lyons Calvin (Pro, Se), DAUGHTER, Trustee and Executor of Jimmie Lyons and
Mercy D. Lyons Irrevocable Trust, Submits Second (2) Amendment Compliant and in behalf of
the plaintiff and members the adult children of the Estates;

Jimmie Lyons Jr., and of Oklahoma, Yolanda D. Lyons Lee of Oklahoma,

Paula F. Lyons Thompson of Texas, Quentin W. Lyons of Texas,

Constance P. Lyons McClain of Florida,

Vanessa G. Lyons Calvin of Arizona, Spouse Otis Calvin of Arizona,

Sons Michael Lyons of Virginia, Milton Lyons of California

This Amendment Compliant includes Adoption by References from the Compliant dated
November 23, 2016 and The Motion to Respond to secure the facts already submitted in detail
against each defendant and the evidences in the documents as Book 1, 2, and the Motion
Response Book 3 (this one is referenced as Book 3). All Defendants did not Respond to the
Compliant dated Nov. 23, 2016 (see Motion to Respond Pgs. 2-7 and Book 3 Tab, 1)

All Defendants did not Respond to the Compliant dated Nov. 23, 2016 (see Motion to Respond Pgs. 2-7 and Exhibit Book 3 Exhibit Tab, 1)

*Complaints Arising Under Federal Question Jurisdiction

Under 28 U.S.C. § 1331, In which this part of the case arises under the United States Constitution of Federal Laws and Treaties and contains a Federal Question.

This action arises under the Civil Rights Act, 42 U.S.C.A. § 1983:

This action arises under the Civil Rights Act, 42 U.S.C.A. § 1981:

This action arises under the Civil Rights Act, 42 U.S.C.A. § 1982:

Violations of Title 18 of the United States Code.

Violations of U.S. Code: Title 15 COMMERCE AND TRADE

FEDERAL TRADE COMMISSION

Violations of the 1st Amendment Rights, Federal Question Violitions Civil Rights of the Constitution, Violations of The Equal Protection Clause, Due Process Clause, Intentional Tort Interferences, Tortious Contract with the intent to intentionally causing harm, and Restraints of Trade, Common Law, Trespass Laws, Violation Of Federal and State Statutes, Intestacy laws, Inheritance Law, Violations Of The Judicial Ethics Code And Breach of Fiduciary Duties, Protecting And Concealing Bigamist Activity.

*Complaints Arising Under Diversity Jurisdiction

Of Intentional Fraud & Reckless Conduct, Embezzlement And Extortion Gross Negligence And Misrepresentation & Breach Of Contract, Intentionally Causing Severe Mental And Emotional Distress, Harm, Pain & Suffering, General Damages, Monetary Losses, And (1) Damages Suffered Against The Personal Estate Of Jimmie Lyons, (2) Damages Suffered Against The Estate Of Jimmie Lyons and Shirley Ann Lyons And (3) Damages Suffered Against The Estate Of Jimmie Lyons and Mercy D Lyons Irrevocable Trust 1991, And (4) Damages Suffered Against The Estate Of Mercy D Lyons Irrevocable Trust 1991, Damages Suffered Against The Personal Estate Of Otis Calvin, Damages Suffered Against The Powers Of The Trustee And Executor Of The State Of Arizona Vanessa Calvin. Under 28 U.S.C. § 1331, In which this part of the case arises under the United States Constitution of Federal Laws and Treaties and contains a Federal Question.

(Wirt
Burke exhibit
1-60)

IN THE UNITED STATES DISTRICT COURT OF THE
WESTERN DISTRICT OF OKLAHOMA

FILED

APR 19 2017

VANESSA G. LYONS CALVIN,
DAUGHTER, TRUSTEE & EXECUTOR OF
THE JIMMIE LYONS & MERCY D. LYONS
IRREVOCABLE TRUST DATED 1991

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY TBM, DEPUTY

Plaintiff's

Case NO. CIV-16-1225-HE

vs

1. STATE OF OKLAHOMA
2. DISTRICT OF COMANCHE COUNTY
DISTRICT #5
3. JUDGE GERALD F. NEUWIRTH
4. JOHN W. DOOLIN, (Bar #2427)
5. VICKIE LEYJA, (Bar #17527)
ATTORNEY AT LAW
6. SHIRLEY ANN LYONS
7. NATIONWID ADVANTAGE
MORTGAGE COMPANY
8. MARKET ONE REAL ESTATE FRIM.
MR. & MRS. HANK CHANG
9. SOUTHWEST ABSTRACT & TITLE CO.
10. BANCFIRST 501 C Ave., Lawton Ok. 73502
11. JEFF L & ROBIN J BREWER

CLASS ACTION, CIVIL RIGHTS,
DIVERSITY JURISDICTION,

Defendant's

MOTION TO RESPOND TO THE DEFENDANT
NATIONWIDE ADVANTAGE MORTGAGE COMPANY'S
MOTION TO DISMISS DATED APRIL 5, 2017 AGAINST
PLAINTIFF'S AMDNED COMPLAINT DATED MARCH 29, 2017

COMES now, Vanessa G. Lyons Calvin (Pro, Se), DAUGHTER, TRUSTEE & EXECUTOR OF THE
JIMMIE LYONS & MERCY D. LYONS IRREVOCABLE TRUST DATED 1991, in behalf of the Trust and
the Beneficiaries who are the adult children born of the marital union of Jimmie Lyons and
Mercy D Lyons Irrevocable Trust 1991 submits this request as follows;